

**Commonwealth of Kentucky**  
**Division for Air Quality**  
**PERMIT STATEMENT OF BASIS**

Title V Draft Permit, No. V-97-050  
**East Kentucky Power Cooperative Inc.**  
**Hugh L. Spurlock Power Station**  
Maysville, Kentucky 41056  
December 19, 1997  
KOOROSH FARHOUDI

**SOURCE DESCRIPTION, CONTROL EQUIPMENTS & CONSTRUCTION DATE:**

- E. Unit 01: Pulverized coal-fired, dry bottom, wall fired unit equipped with electrostatic precipitator and low-NO<sub>x</sub> burners constructed before 1971.
- E. Unit 02: Pulverized coal-fired, dry bottom, tangentially fired unit equipped with electrostatic precipitator and low-NO<sub>x</sub> burners and flue gas desulfurization system constructed after 1971.
- E. Unit 03 Oil fired auxiliary boiler constructed before 1971.
- E. Unit 04: Coal handling operation includes transfer tower # 1& 2, sampling tower, radial stacker off-loading onto coal pile, reclaim hoppers onto coal conveyor, crusher house, and conveyor drop points. Modified in 1981.
- E. Unit 06 Two fly ash silos (loadout). Constructed in 1993.
- E. Unit 07 Coal handling operations includes: rotary railcar unloader, barge unloader, haul roads, and yard area constructed before 1970.

**REGULATION APPLICABILITY:**

All the applicable regulations to the emission units are listed in the permit. The following regulations are not applicable based on size of emission unit or applicability date of regulation.

Regulations not applicable to Emissions Units 1, and 3 due to applicability date or size of unit:

Regulation 401 KAR 59:016, New electric utility steam generating units, incorporating by reference 40 CFR 60 Subpart Da.

Regulation 401 KAR 60:042, Standards of performance for industrial- commercial-institutional steam generating units, incorporating by reference 40 CFR 60 subpart Db.

Regulation 401 KAR 59:015, New indirect heat exchangers, incorporating by reference 40 CFR 60 subpart D.

Regulations not applicable to Emissions Unit 2 due to applicability date or size of unit:

Regulation 401 KAR 59:016, New electric utility steam generating units, incorporating by reference 40 CFR 60 Subpart Da.

Regulation 401 KAR 60:042, Standards of performance for industrial- commercial-institutional steam generating units, incorporating by reference 40 CFR 60 subpart Db.

Regulation 401 KAR 61:015, Existing indirect heat exchangers.

Regulation not applicable to Emissions Unit (07)( Coal Handling) due to affective date of the Regulation.

Regulation 401 KAR 60:250, Standards of performance for coal preparation plants, adopting by reference 40 CFR subpart Y.

**COMMENTS:**

- The permittee may assure compliance with sulfur dioxide allowable standards for emissions units 1 and 2 by using sulfur dioxide continuous emission monitoring data.
- The permittee will be required to conduct at least two particulate matter mass emission performance tests for emissions units 1 and 2 to demonstrate compliance with allowable particulate matter mass emission standard within the term of this permit. The permittee may assure continuing compliance with the opacity standard using COM data. The permittee may assure continuing compliance with the particulate matter mass emission standard using the COM data as an indicator as described in the permit. Additional stack testing for particulate matter emissions may be required under circumstances described in the permit.
- The permittee shall submit a compliance assurance monitoring (CAM) plan for emissions units 1 and 2 with an application for significant revision of those emissions units or with the application for Title V permit renewal.
- This source is subject to acid rain requirements and the Division has issued a Phase II acid rain permit for this facility ; Permit Number: AR-96-11.
- The permittee has not proposed any alternate operating scenario for any of the emissions units.
- This permit does not impose any emission cap on any of the emissions units.
- Emissions unit 4 is subject to Regulation 401 KAR 60:250, Standards of performance for coal preparation plants. The permittee may assure compliance with the opacity standard by assuring proper operation of the baghouses. Proper operation of the baghouses can be assured by weekly qualitative observation of stack emissions. If visible emissions from any stack during visual observations are perceived or believed to exceed the applicable standard, the permittee shall determine the opacity of emissions by Reference Method 9 and instigate an inspection of the control equipment for any necessary repairs.
- Emissions Units 6, two fly ash silos, and 7 , coal handling operations are subject to fugitive emissions Regulation 401 KAR 63:010 and are considered to be in compliance when using control measures required by the regulation.